

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO**

PADDOCK ENTERPRISES, LLC,

Plaintiff/Counterclaim Defendant,

v.

UNITED STATES OF AMERICA,

Defendant/Counterclaim Plaintiff.

Case No. 5:22-cv-1558

Chief Judge Sara Lioi

**UNITED STATES' MOTION TO ENTER THE CONSENT
DECREE WITH PADDOCK ENTERPRISES, LLC**

The United States asks this Court to approve and enter the proposed Consent Decree with Paddock Enterprises, LLC (“Paddock”) lodged on May 13, 2025 (ECF No. 120). The proposed Consent Decree resolves the United States’ claims under Section 107(a) of the Comprehensive Environmental Response, Compensation, and Liability Act (“CERCLA”), 42 U.S.C. § 9607(a), relating to the clean-up of the Jaite Paper Mill Site in the Cuyahoga Valley National Park (the “Site”) in Ohio, natural resource damages, and Paddock’s claim for contribution under Section 113(f) of CERCLA, 42 U.S.C. § 9613(f), in exchange for payments totaling \$33 million.

After lodging the proposed Consent Decree with the Court, the United States also published notice of the proposed settlement in the Federal Register to solicit public comments and held a 30-day public comment period that closed on June 18, 2025. *See* 90 Fed. Reg. 21338 (May 19, 2025). The United States received no public comments. As more fully set forth in the

accompanying memorandum in support of this Motion, the United States believes that the Court should enter the proposed Consent Decree because it is fair, reasonable, and consistent with CERCLA.

June 24, 2025

FOR THE UNITED STATES OF AMERICA:

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